REMARKS

Reconsideration and the timely allowance of the pending claims, in view of the following remarks, are respectfully requested.

In the Final Office Action dated July 20, 2006, the Examiner rejected claims 1-10 and 15-17, under 35 U.S.C. §102(e), as allegedly being anticipated by Hofer '772 (U.S. Patent No. 6,828,772); rejected claims 1-10, 15-18, and 21, under 35 U.S.C. §102(b), as allegedly being anticipated by Segers '483 (U.S. Patent No. 6,404,483); and rejected claims 1-5, 8-10, and 15-21, under 35 U.S.C. §103(a), as allegedly being unpatentable over Aoki '928 (U.S. Patent No. 6,559,928) in view of Akiyama '577 (U.S. Patent No. 4,788,577).

By this Amendment, Applicants have amended claim 1 to overcome the informality indicated by the Examiner and have cancelled claims 2 and 9 without prejudice or disclaimer. Applicants submit that no new matter has been introduced. As such, claims 1-10, 15-18, and 21 continue to be presented for examination, of which claims 1, 15, 18, and 21 are independent. Applicants respectfully request the immediate withdrawal of the objection to claim 1.

Applicants respectfully traverse the prior art rejections, under 35 U.S.C. §102(b),(e) and §103(a) for the following reasons.

I. Prior Art Rejections

As noted above, independent claim 1, positively recites, *inter alia*, the use of a rod coupled to a support frame that is provided with a clamp and a compliant structure configured to compensate for at least one of a tilt and displacement between the object and the clamp, the compliant structure being provided on the rod or the support frame. These features are amply supported by the embodiments disclosed in the Specification. (*See, e.g.*, Originally-filed Specification: par. **[0074]** – **[0075]**, **[0080]**; FIGs. 3a, 3b, 4b, 4c).

In contrast to the Examiner's assertions, none of the asserted references, whether taken alone or in combination, teach or suggest each and every element of claim 1, including the features identified above. In particular, the Hofer '772 reference discloses a flipper shaft **20** coupled to a clamp structure **60**. (*See*, Hofer '772: FIG. 6). The clamp structure **60** comprises three wedge assemblies **50**, **55** in order to securely hold the semiconductor wafer

40 in place. Each of the wedge assemblies **50, 55** contains a V-shaped slot with a rubber material, such as Tygon, to secure the semiconductor wafer **40** within the V-shaped slot. (*See*, Hofer '772: col. 4, lines 46-55).

Without conceding to the representations made by the Examiner, Applicants point out that the Examiner asserted that flipper shaft **20** corresponds to the claimed rod and that wedge assemblies **50, 55** correspond to the claimed compliant structure. With this said, Applicants further point out that Hofer '772 specifically teaches that wedge assemblies **50, 55** are provided on clamp **60** – ***not*** on the rod or the support frame, as required by claim 1. Accordingly, the Hofer '772 reference cannot anticipate claim 1.

With regard to Segers '483, this reference teaches the use of a two-part arm **131** configured as two flat portions attached by a hinge and a pick-up hand **133** attached to the end of two-part arm **131**. (*See*, FIGs. 5a-5c). The pick-up hand **133** includes two fingers **134** which are inserted underneath wafer **W** to pick-up the wafer **W**. (*See*, Segers '483: col. 7, lines 6-18; FIG. 5a-5c). Segers '483 further discloses that the connection between the pick-up hand **133** and two-part arm **131** allows for a certain amount of movement so that the pick-up hand **133** can be moved into correct alignment even if the two-part arm **131** is not perfectly aligned. (*See*, Segers '483: col. 7, lines 18-22; FIG. 5a-5c).

The Examiner asserted that the two-part arm **131** corresponds to the claimed rod and that the two fingers **134** correspond to the claimed clamp. Applicants strenuously disagree. That is, as noted above, Segers '483 specifically shows two-part arm **131** configured as two flat portions attached by a hinge and in no way does such a configuration resemble a rod. In so doing, Segers '483 fails to teach or suggest the use of a rod coupled to a support frame as well as the compliant structure being provided on the rod or the support frame. Accordingly, the Segers '483 reference cannot anticipate claim 1.

With respect to the remaining references, the Examiner acknowledged that Aoki '928 fails to teach the claimed compliant structure and the Examiner, therefore, relied on Akiyama '577 as allegedly teaching this feature. Akiyama '577 teaches the use of a flexible chuck **10** with a base plate **14** and columns **15** provided on the stage **3** that support the base plate **14**. Disposed through the base plate **14** are column screws **16**, each corresponding to each triangular block **12**, for supporting the flexible chuck **10**, and spring-loaded bars **17** for pulling or biasing downwardly the flexible chuck **10**. Each of the column screws **16** meshes

with an internal thread formed in the base plate **14** and is rotated by a motor **19** via a flexible coupling **18** to effect a vertical movement, thereby displacing flexible chuck **10** vertically. (*See*, Akiyama '577: col. 4, lines 25-33; FIG. 6).

The Examiner asserted that flexible coupling **18** corresponds to the claimed compliant structure. Applicants strenuously disagree. Akiyama '577 specifically teaches that flexible coupling **18** is connected to column screws **16** to move flexible chuck **10** vertically. As such, Akiyama '577 is incapable of teaching or suggesting the use of a rod coupled to a support frame as well as the compliant structure being provided on the rod or the support frame, as required by claim 1.

For at least these reasons, Applicants submit that the none of the asserted references teach or suggest the claimed combination of elements recited by amended claim 1. In addition, because claims 3-8 and 10 depend, either directly or indirectly, from claim 1, claims 3-8 and 10 are also patentable by virtue of dependency as well as for their additional recitations. Accordingly, Applicants submit that claims 1, 3-8 and 10 are patentable and request the immediate withdrawal of the prior art rejections of these claims.

Furthermore, because independent claims 15, 18, and 21 recite similar patentable features as noted above with respect to claim 1, claims 15, 18, and 21 are also patentable for at least the reasons submitted relative to claim 1. And, because claims 16-17 depend from claim 15, claims 16-17 are also patentable by virtue of dependency as well as for their additional recitations.

II. Conclusion.

All matters having been addressed and in view of the foregoing, Applicants respectfully request the entry of this Amendment, the Examiner's reconsideration of this application, and the immediate allowance of all pending claims.

Applicants submit that the entry of this Amendment is proper under 37 C.F.R. §1.116, as the claim changes: (a) place the application in condition for allowance for the reasons discussed herein; (b) ***do not require any further consideration as the claim changes employ limitations from originally-filed dependent claims that should have already been searched***; and (c) places the application in better form for an Appeal, should an Appeal be necessary.

Applicants' Counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the Undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number **03-3975**. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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